

## **REMARKS:**

Claims 24-30, 33, 35-37, 41-45, 48-54, and 56-68 were pending in this application. Claims 24, 41, 48, and 56 were amended. Claims 69-74 were added. Therefore, claims 24-30, 33, 35-37, 41-45, 48-54, and 56-74 are pending in this application.

The amendments and new claims are supported in the specification by at least the following passages: page 9, line 20, to page 10, line 10; page 12, lines 8-20, page 13, line 8 to page 14, line 2; and page 15, line 17 to page 16, line 4; and figure 1, figure 8, and figure 9.

## **Claim Objections**

The Examiner has objected to the use of the word “tangible” in claim 56. Applicant submits that the term “tangible” would be well understood by those of ordinary skill in the relevant art (indeed, the term does not have any special technical meaning). To offer further clarity, Applicant submits that a “tangible computer readable memory medium” does not include, for example, intangible embodiments such as signals. Given the fact that the term “tangible” is a well understood term that clearly excludes non-statutory subject matter, Applicant respectfully requests removal of the objection.

## **Art Based Rejections**

Claims 24-25, 27-28, 33, 35, 41-43, 45, 48-52, 56-57, 61, and 65-68 stand rejected under 35 U.S.C. § 102 by Freeman et al. (U.S. Pub. No. 2005/0125714.) Applicant respectfully disagrees.

Freeman does not have any concept of “storing a record ... indicating the *physical location* of an *original physical document*” that “correspond[s] to [an] electronic document,” as recited in amended claim 24. Instead, Freeman is directed toward a “document stream operating system,” one of the objects of which “is to provide an operating system which takes advantage of the nature of *electronic* documents.” Freeman at Abstract and at ¶13 (emphasis added). Freeman thus does not teach (or have any reason to teach) a “*physical location* of an *original physical document*,” nor does Freeman disclose “storing a record” “contain[ing] information indicating” such a physical location, as recited in claim 24. For at least these reasons, Freeman fails to teach each and every limitation of claim 24. For at least similar reasons, Freeman also fails to each and every limitation of independent claims 41, 48, and 56, which have been

similarly amended. Applicant respectfully requests the withdrawal of the rejections of claims 24, 41, 48, and 56 under § 102.

Because the limitations of the dependent claims are not taught by Freeman, Applicant further requests the withdrawal of all rejections of the dependent claims under § 102, including claims 25, 27-28, 33, and 35 (which depend from claim 24); claims 42-43, and 45 (which depend from claim 41); and claims 49-52 (which depend from claim 48; and claims 57 and 61). Applicant also requests withdrawal of all rejections of dependent claims under § 103, including claims 26, 29, 36, 37, 44, 50, 53, 58-60, and 62-63, which depend variously from claims 24, 41, 48, and 56.

Claims 69-72 are dependent on claims 24, 41, 48, and 56, respectively, and are also believed to be patentably distinct over the cited art.

Claim 73 recites in part: “generat[ing] a first unique identifier that corresponds to the point in time at which [an] electronic document was received into [a] document management system,” “generat[ing] a second unique identifier that specifies *an entity associated with the electronic document and a file number for the specified entity*,” and “stor[ing] the electronic document *and its first and second unique identifiers* in [a] storage subsystem,” “wherein the first and second unique identifiers for a given one of [a] succession of electronic documents are *each usable* to access the given electronic document from the storage subsystem.” Applicant submits that Freeman does not teach a **“second unique identifier that specifies an entity associated with the electronic document and a file number for the specified entity.”** Nor does Freeman teach “stor[ing]” such a “second unique identifier” “in [a] storage subsystem,” or any of the other above limitations of claim 73. Applicant thus submits that claim 73 is patentably distinct. Claim 74 depends from claim 73, and for that reason alone is distinguishable from Freeman. However, claim 73 also recites a “relational database,” and Freeman does not recite a “database” even once. Thus, Applicant submits that claim 74 is also patentably distinct.

**CONCLUSION:**

Applicant respectfully submits the application is in condition for allowance, and an early notice to that effect is requested.

If any extension of time (under 37 C.F.R. § 1.136) is necessary to prevent the above-referenced application from becoming abandoned, Applicant hereby petitions for such extension.

The Commissioner is authorized to charge any fees that may be required, or credit any overpayment, to Meyertons, Hood, Kivlin, Kowert & Goetzel, P.C. Deposit Account No. 501505/5957-72402/DMM.

Respectfully submitted,

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